

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ROBERT A. TAYLOR,)	
)	
Plaintiff,)	Case No. 13 C 4597
v.)	
)	Judge Manish S. Shah
RICKY A. HUGHES, et al.,)	
)	
Defendants.)	

**PLAINTIFF’S UNOPPOSED *EMERGENCY* MOTION TO RESET TRIAL DATE DUE
TO FAMILY MEDICAL EMERGENCY FOR PLAINTIFF’S LEAD ATTORNEY,
IRENE K. DYM KAR**

Plaintiff, ROBERT A. TAYLOR, by and through his attorneys, Irene K. Dymkar and Shamoyita M. DasGupta, hereby brings this unopposed emergency motion to reset the trial date, due to a family medical emergency for plaintiff’s lead trial attorney, Irene K. Dymkar. In support of his motion, plaintiff states:

- 1) This action was commenced by the filing of a complaint alleging a cause of action under the Civil Rights Act of 1871 (42 U.S.C. § 1983), to redress deprivations of the civil rights of plaintiff through acts and/or omissions of defendant committed under color of law.
- 2) Plaintiff requests that this Court reset the trial date of April 10, 2023, due to a family medical emergency for plaintiff’s lead attorney, Irene K. Dymkar.
- 3) Specifically, attorney Dymkar’s husband has been experiencing medical problems for the past three weeks. His medical issues became severe enough that he was admitted through the emergency room to the hospital on March 31, 2023. He improved over the next few days and was discharged on April 5, 2023, and was returning to normalcy. Unfortunately, however, in the morning of April 9, 2023, his previous symptoms returned with more severity than he had experienced prior to his admission to the hospital.
- 4) Attorney Dymkar has continued to prepare for this trial while also caring for her husband amidst his ongoing medical issues, and sincerely believed that his condition had

improved enough that she would be able to proceed with the trial in this case. Unfortunately, with the return of his symptoms this morning and the likelihood that he will be hospitalized again, as well as the fact that attorney Dymkar's adult children all live out-of-state, plaintiff has no choice but to respectfully ask the Court to reset the trial in the instant case, scheduled to begin on April 10, 2023.

5) As the attorney who has worked extensively on this case for over a decade, since Mr. Taylor first sought out a civil rights attorney, the trial cannot proceed without attorney Dymkar.

6) Attorney Dymkar spoke with the lead attorney for defendant, Scott A. Cohen, by phone on April 9, 2023, and he does not oppose this motion.

7) Plaintiff sincerely regrets the inconvenience this causes to the Court and to all parties, especially given the lateness of the request and the resources the Court has already put towards the case and towards assembling a jury venire. Plaintiff's counsel would not be making this request if she did not believe that this is a true emergency.

WHEREFORE, plaintiff requests that this Court grant his unopposed emergency motion to reset the trial date, due to a family medical emergency for plaintiff's lead attorney, Irene K. Dymkar.

Dated: April 9, 2023

/s/ Irene K. Dymkar
Irene K. Dymkar

Attorneys for Plaintiff:

Irene K. Dymkar
Shamoyita M. DasGupta
Law Office of Irene K. Dymkar
53 West Jackson, Suite 733
Chicago, IL 60604-3462
(312) 345-0123

CERTIFICATE OF SERVICE

I, Irene K. Dymkar, an attorney, certify that on April 9, 2023, a copy of PLAINTIFF'S UNOPPOSED *EMERGENCY* MOTION TO RESET TRIAL DATE DUE TO FAMILY MEDICAL EMERGENCY FOR PLAINTIFF'S LEAD ATTORNEY, IRENE K. DYM KAR, was served upon the attorneys for defendant named below through the Court's electronic filing system.

Scott A. Cohen
Raoul V. Mowatt
Emily R. Bammel
City of Chicago, Department of Law
2 N. LaSalle, Suite 420
Chicago, IL 60602

Dated: April 9, 2023

/s/ Irene K. Dymkar
Irene K. Dymkar